Site History for Regional Administrator
Procino Plating Inc., Blades, Delaware

Date: November 21, 2016 **Staff Contact/Phone #: Connor O'Loughlin, 4-3304; Kristeen Gaffney, 4-2092**

Issue/Topic:
HSCD's Site Assessment Program has been working with the Delaware Department of Natural Resources and Environmental Control (DNREC), since October, 2010 to investigate the impact of groundwater contamination at Procino Plating Inc., 901 Market Street in Blades, Delaware. DNREC conducted a Preliminary Assessment and a Site Investigation on behalf of Region 3, through a cooperative agreement, due to concerns over metals, and acidity contamination in the groundwater and residential wells. Chromium has been detected in groundwater beneath the Site and the facility is conducting a remedial action through Delaware's voluntary clean-up program (VCP). The SI identified usage of chemicals at the facility containing PFOA. The Town of Blades water supply wells are located approximately 1,300 feet north of the Procino Plating property. DNREC is requesting to use cooperative agreement funds to test the municipal wells and several residential wells for PFOA/PFOS and metals.

Background and History:
Procino Plating Inc. operates the Site and manufactures ornamental plating with copper, nickel and chrome; silver and nickel plating for commercial and military use; and fabrication and hard chrome plating of griddle tops since approximately the 1980's.

Regulatory Issues
- Procino Plating Inc. received notices of violation from DNREC-SHWMS and USEPA for improper handling of hazardous waste in 1994 and 2002.
- The facility also had unsatisfactory inspections in 2007/2008. The owner indicated that metal plating operations ceased at the facility in 2007. The facility continues to fabricate metal products and templates, but no longer does plating.
- In 2008, Sussex County modified Procino Plating's industrial user permit to specifically prohibit the discharge of waste water generated as a result of electroplating operations.
- From June 2009 through March 2010, the owner for Procino Plating illegally processed, through its wastewater treatment plant, stored drums of chemicals which were left over from its former electroplating operations and, in violation of its now modified Clean Water Act mandated permit, discharged resulting wastewater to the Seaford treatment plant.

Removal Investigation
- In 2008 EPA's Superfund Emergency Response requested support from EPA's Criminal Investigation Division in 2009, and then Superfund's Site Assessment Branch in 2010.
- On October 2, 2008 the OSC and DNREC toured the facility in order to evaluate the Site. The OSC and DNREC were concerned by a large number of unlabeled and unidentified containers of hazardous substances, incompatible materials, leaks, spills, and poor house-keeping which could have posed a threat to human health.

Criminal Investigation
EPA initiated a Federal criminal investigation for hazardous waste storage and wastewater treatment permit violations in 2010. In May 2010, EPA exercised a search warrant and seized the company records and took samples. These actions and the follow up investigation conducted by the USEPA led to criminal charges against Procino Plating.
- On October 15, 2013, the owner entered a guilty plea as a private individual. The owner was sentenced on February 27, 2014 to one-year probation, a $50,000 fine, and a $100 special assessment for one count of illegal storage of hazardous waste without a permit.

- On October 15, 2013, as the owner/operator of Procino Plating, Inc., Procino entered a guilty plea on behalf of that corporation to one count of violating the Clean Water Act. Procino was sentenced to five years' probation and a $400 special assessment.

Superfund Preliminary Assessment/Site Investigation

- DNREC-SIRS conducted a Preliminary Assessment and Site Inspection of the property in 2010/2011. During DNREC's investigations, chromium was detected in groundwater beneath the facility and offsite locations at concentrations exceeding applicable regulatory criteria. A total of 12 private water supply wells surrounding the site were sampled for metals, VOCs, PCBs and pesticides and in addition 13 borings and 6 monitoring wells were installed.
- After the initial PA/SI, and at the request of the state, EPA deferred the site to DNREC for priority cleanup.

Voluntary Clean-up Program

- Procino Enterprises Inc. joined DNREC's Voluntary Cleanup Program (VCP) in 2011 to conduct a Remedial Investigation (RI) at the Site in order to determine the extent of chromium impact to groundwater.
- In July 2015, as part of the removal action, approximately 14 tons of chromium-impacted soil was removed from the suspected source area inside the Procino Plating building, and was transported to a permitted facility for disposal.
- DNREC received the consultant's Remedial Investigation (RI) Report in April, 2016 to characterize the chromium contamination. As part of the RI, 27 soil samples and 12 new monitoring wells were installed to evaluate the contamination onsite.
- In May 2016, EPA's new Site Assessment manager was reviewing the previous PA/SI documentation and noted the presence of the chemical Fumetrol 140 on containers in the facility in site photographs in the PA and SI reports. This compound is known to contain PFOA/PFOS and if released may be comingled with the chromium plume. EPA notified DNREC of this new finding. In response, in November 2016, DNREC requested to sample offsite wells for the presence of PFOA/PFOS. The municipal and residential wells have never been sampled for PFC's.
- DNREC issued public notice of the Final Proposed Plan for the RI for the Procino Plating Site on July 24, 2016. There were no comments or questions from the public regarding the Proposed Plan and the remediation will proceed.

Direction/Decision:

- No RA decision needed at this time.
- HSCD had a meeting on October 15, 2016 and discussed the technical specifics of using cooperative agreement money to investigate the offsite wells for PFOA/PFOS in a call with Office of Superfund Remediation and Technology Innovation (OSRTI). Two municipal wells and three residential wells have been identified by DNREC. There is potential that the source areas from the Procino Plating Inc. facility that could potentially affect the municipal wells. However, more data is needed to define the extent of the plume and the effect on the wells nearby. Headquarters concurred that the Site should be further investigated for PFAS contamination in groundwater based on historical information, groundwater sampling data of the metals plume, and the past enforcement and RCRA histories.

Political Interest (local/state/federal): None at this time.

Follow-up: DNREC has requested EPA support with additional sampling and requested to use cooperative agreement money to sample the two municipal wells and three residential wells to ensure that the full extent of contamination is identified.